

Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of)
Modernizing the E-rate Program for) WC Docket No. 13-184
Schools and Libraries)

Comments regarding
Notice of Proposed Rulemaking
Category 2 Budgets

INTRODUCTION

The Thermalito Union Elementary School District (TUESD) is a small school district in far northern California. We rely heavily on the E-rate program to help our schools continue to provide the needed Internet access and infrastructure to support the growing trends in digital learning.

We thank the Federal Communications Commission (FCC) for seeking public input on how to make the E-rate program even better. The Modernization Orders provided a much needed re-design to the structure of the funding dedicated to hardware and infrastructure, now known as category two. We support the FCC in its goal to continue streamlining and simplifying the program, while at the same time ensuring the schools have access to the funds needed.

Our comments are brief and are labeled based on the paragraph number of the Notice of Proposed Rulemaking (NPRM).

COMMENTS

Paragraph 14: **Category two budget approach.** TUESD strongly supports the permanent extension of the category two budget approach. We believe the basic foundation provides equal access to funds for all schools, no matter the poverty level.

Paragraphs 19 – 21: **Budget levels.** The current budget level allows us to maintain our existing infrastructure while replacing a few components at a time. However, when a large-scale upgrade is needed in the future, the current budget level will be very insufficient. Cabling and backbone upgrades will require a substantial increase to the current per student budget. The current budget levels would allow us to accomplish one, but not both upgrades in a five year period. Doubling the per-student budget, at minimum, would be a step in the right direction.

The TUESD also supports raising the funding floor to \$25,000 since this will provide more equitable funding for the small schools. The current floor of \$9,200 does not cover the enterprise level equipment needed to provide reliable Internet access to the students.

Paragraphs 22 – 27: **Agency-wide budget calculations.** The TUESD supports moving to an agency wide budget. The current site-by-site budget made it impossible for TUESD to maximize the E-rate funds since the needs at each school were different. The current site restricted budgets do not align with agency needs and it creates an unnecessary challenge to administer.

We agree that making the budget agency-wide will simplify the administrative burden. The relief on the FCC Form 471 alone will be significant, not to mention the FCC Form 500 and other related processes.

Paragraph 28 - 29: **Budget calculations.** The TUESD prefers to have an annual adjustment to the budget. We acknowledge that there is a level of administrative burden to go along with such an adjustment, but our enrollment fluctuates enough that the adjustment is most advantageous for our agency.

In conclusion, we wish to express our appreciation for the opportunity to comment on the Category two budget changes.

Respectfully submitted,



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Thermalito Union Elementary School District